

Privilege ID Number	Author	Recipient	cc.	Subject/ Document Title	Privilege Asserted	Factual Basis of Privilege	Document Relates to Damages	Enhanced Description
PRVCTRL0000001	Mike Davis	Nancy Cartmill, Jim Morgan, Bob Bailey	Beth Thompson, Mike Davis, Mike Tatum, Dan Marcum	911 Center Fire Responses	Attorney Client Communication	Communication internally disseminating legal advice received on behalf of the County		
PRVCTRL0000044	Jim Morgan	Beth Thompson		Opioid Litigation update	AC and AWP; Common Interest	Email chain from outside counsel to client regarding litigation update.	X	Beth Thompson forwarding Opioid Litigation Update that is logged at PRVCTRL0000041, 0000042, 0000043 to Jim Morgan.
PRVCTRL0000045	Chad Nelson	Beth Thompson		FW: Innovative Prosecution RFP	AC and AWP	Email chain and attachment between client and counsel sending draft documents at request of counsel for review/legal advice.		Initiating email is from Margaret Phipps Brown (assistant prosecuting attorney) seeking information from the County.
PRVCTRL0000091	Jeffrey Sansom	Angela Godby		Re: Brandon Crabtree	Attorney Client Communication; Attorney Work Product	Email regarding strategy for active criminal case (prosecutor's office).		Angela Godby is the office Manager of Cabell County Prosecutor's Office, this email is written in her capacity as an agent of the prosecutor's office.
PRVCTRL0000120	Julie E. Spence			Taylor ER Petition	AC and AWP	Draft email and attachment from attorney to client regarding case preparation/ petition.		This entry is a draft of PRVCTRL0000119.
PRVCTRL0000124	Julie E. Spence			Hammonds Petition	AC and AWP	Draft email and attachment from attorney to client regarding case preparation/ petition.		This entry is a draft of PRVCTRL0000123.
PRVCTRL0000128	Julie E. Spence			Sullivan ER petition	AC and AWP; Common Interest	Draft email and attachment from attorney to client regarding case preparation/ petition.		This entry is a draft of PRVCTRL0000127.
PRVCTRL0000131	Julie E. Spence			Meadows non-ER petition	Attorney Client Communication	Draft email and attachment from attorney to client regarding case preparation/ petition.		This entry is a draft of PRVCTRL0000130.
PRVCTRL0000133	Julie E. Spence			Bartram Petition	AC and AWP	Draft email and attachment from attorney to client regarding case preparation/ petition.		This entry is a draft of PRVCTRL0000132.
PRVCTRL0000135	Julie E. Spence			Napier Petition	AC and AWP	Draft email and attachment from attorney to client regarding case preparation/ petition.		This entry is a draft of PRVCTRL0000134.
PRVCTRL0000137	Julie E. Spence			Ball ER petition	AC and AWP	Draft email and attachment from attorney to client regarding case preparation/ petition.		This entry is a draft of PRVCTRL0000136.
PRVCTRL0000142	Julie E. Spence			Slater petition	AC and AWP	Email and attachments between client and counsel regarding review/legal advice on draft petition involving other (minor child) litigation.		This entry is a draft of PRVCTRL0000141.
PRVCTRL0000153	Julie E. Spence			Adkins-Bartram petition	AC and AWP	Draft email and attachment from attorney to client regarding case preparation/ petition.		This entry is a draft of PRVCTRL0000152.
PRVCTRL0000155	Julie E. Spence			Sothen ER Petition.docx	AC and AWP	Draft email and attachment from attorney to client regarding case preparation/ petition.		This entry is a draft of PRVCTRL0000154.
PRVCTRL0000157	Julie E. Spence			Small ER petition	AC and AWP	Draft email and attachment from attorney to client regarding case preparation/ petition.		This entry is a draft of PRVCTRL0000156.
PRVCTRL0000163	Julie E. Spence			ER petition	AC and AWP	Draft email and attachment from attorney to client regarding case preparation/ petition.		This entry is a draft of PRVCTRL0000162.
PRVCTRL0000168	Julie E. Spence			Veronica Keesee	AC and AWP	Draft email and attachments from attorney to client regarding case preparation/ petition.		This entry is a draft of PRVCTRL0000167.

PRVCTRL0000173	Julie E. Spence			Veronica Kesse referrals	AC and AWP; Common Interest	Draft email and attachments from attorney to client regarding case preparation/ petition.		This entry is a draft of PRVCTRL0000172.
PRVCTRL0000243	Jim Morgan	Beth Thompson		Re: Opioid Litigation Update- November 7, 2017	AC and AWP; Common Interest	Email providing update from outside counsel regarding litigation update.	X	Jim Morgan confirming receipt of Beth Morgan's forwarded message re Opioid Litigation Update that is logged at PRVCTRL0000242
PRVCTRL0000284	Toya D. Moore			Information for petition.docx	Attorney Client Communication; Attorney Work Product	Attachment to email between client and counsel seeking/providing legal advice and mental impressions regarding draft pleading		The metadata does not provide an attorney, though like many of the other similar documents logged, this document is clearly (watermarked) a draft petition for filing by the prosecutor's office.
PRVCTRL0000305	Brandon Williams			Ward Petition.doc	AC and AWP	Attachment to email between client and counsel seeking/providing legal advice and mental impressions regarding draft pleading		The metadata does not provide an attorney, though like many of the other similar documents logged, this document is clearly (watermarked) a draft petition for filing by the prosecutor's office.
PRVCTRL0000307	Thomas Horton			Maynard, Lafawn - Intake Info..doc	Attorney Client Communication; Attorney Work Product	Draft pleading for review/legal advice from counsel	X	Based on the native file "e-author" this draft petition is authored by Peggy Brown, an attorney.
PRVCTRL0000327	Lorren Apgar			Holland Petition.docx	AC and AWP; Common Interest	Attachment to email between client and counsel seeking/providing legal advice and mental impressions regarding draft pleading		This entry is a draft of PRVCTRL0000326.
PRVCTRL0000339	Morgan Brumfield			Watson, Amanda - Intake Info..docx	Attorney Client Communication; Attorney Work Product	Attachment to email between client and counsel seeking/providing legal advice and mental impressions regarding draft pleading	X	This entry is a draft of PRVCTRL0000338.
PRVCTRL0000400	Mikhaela Young			slaytonpetition.docx	AC and AWP	Email and attachment(s) seeking/providing legal advice regarding draft petition for other (minor child) litigation.	X	This entry is related to PRVCTRL0000399, and includes the county's prosecutor's office and work product.
PRVCTRL0000409				Bureau for Children and Families Client Contact Report	Attorney Client Communication	Report containing legal advice regarding child custody case		The redaction covers notes from the case worker related to a call to Prosecuting Attorney Peggy Brown.
PRVCTRL0000411	Harper A. Thacker			Friend Petition.docx	Attorney Client Communication;Attor ney Work Product;Common Interest	Attachment to email between client and counsel seeking/providing legal advice and mental impressions regarding draft pleading	X	This entry is a draft of PRVCTRL0000411.
PRVCTRL0000418	Harper A. Thacker			Starr-Bailey Petition.docx	AC and AWP; Common Interest	Email chain and attachment(s) between client and counsel seeking/providing legal advice for draft pleading in other (minor child) litigation.	X	Documents are collected and shared by Lindsay Casto, Cabell County Prosecuting Attorney's Office Paralegal.

PRVCTRL0000419	Cabell County CPS			Starr-Bailey FFA.pdf	Attorney Client Communication; Attorney Work Product; Common Interest	Email chain and attachment(s) between client and counsel seeking/providing legal advice for draft pleading in other (minor child) litigation.	X	Documents are collected and shared by Lindsay Casto, Cabell County Prosecuting Attorney's Office Paralegal.
PRVCTRL0000420	Cabell County CPS			Starr-Bailey contacts.pdf	AC and AWP; Common Interest	Email chain and attachment(s) between client and counsel seeking/providing legal advice for draft pleading in other (minor child) litigation.	X	Documents are collected and shared by Lindsay Casto, Cabell County Prosecuting Attorney's Office Paralegal.
PRVCTRL0000426	WVOT			Hamrick petition.docx	AC and AWP; Common Interest	Attachment to email between client and counsel seeking/providing legal advice and mental impressions regarding draft pleading	X	This entry is a draft of PRVCTRL0000425.
PRVCTRL0000435	Demetria Russell			Judd, Chrystina - CPS Allegations.doc	Attorney Client Communication; Attorney Work Product; Common Interest	Draft pleading involving other (minor child) litigation for review, legal advice and/or finalizing by counsel.		Based on the native file "e-author" this draft petition is authored by Peggy Brown, an attorney.
PRVCTRL0000439	Lorren Agpar			Miller Petition.docx	AC and AWP	Draft pleading involving other (minor child) litigation for review, legal advice and/or finalizing by counsel.	X	Based on the native file "e-author" this draft petition is authored by Peggy Brown, an attorney.
PRVCTRL0000442	Roger D. Justice			Pendleton Petition.docx	Attorney Client Communication; Attorney Work Product	Draft pleading regarding other (minor child) litigation.		Based on the native file "e-author" this draft petition is authored by Peggy Brown, an attorney.
PRVCTRL0000444	Kelli Hively-Jett			Vaught petition.docx	AC and AWP; Common Interest	Attachment to email between client and counsel seeking/providing legal advice and mental impressions regarding draft pleading	X	Pdf document that does not provide electronic metadata. Physical title of the document is "Cabell County Prosecuting Attorney's Office Information for Abuse and Neglect Petition." The document is marked "draft."
PRVCTRL0000452	WVOT			Collateral Contact Report	AC and AWP; Common Interest	Notes regarding status, strategy, and/or mental impressions by/for counsel regarding other (minor child related) litigation		This entry is a draft of PRVCTRL0000451.
PRVCTRL0000457	Demetria Kosh			WattsPetition.doc	AC and AWP; Common Interest	Attachment to email between client and counsel seeking/providing legal advice and mental impressions regarding draft pleading	X	This entry is a draft of PRVCTRL0000456.
PRVCTRL0000459				Client Contact Report	Attorney Client Communication	Report containing legal advice regarding child custody case		Document is redacted and available at BegBates CABELL_ESI_000533983. Redaction covers case worker notes regarding call to County Prosecutor.
PRVCTRL0000460				Client Contact Report	Attorney Client Communication	Report containing legal advice regarding child custody case		Document is redacted and available at BegBates CABELL_ESI_000542182. Redaction covers case worker notes regarding call to County Prosecutor.

PRVCTRL0000490	Lorren Apgar			attorney notes	Attorney Work Product	Draft pleading involving other (minor child) litigation for review, legal advice and/or finalizing by counsel.	X	Based on the native file "e-author" this draft petition is authored by Peggy Brown, an attorney.
PRVCTRL0000501	Cabell County CPS			Denver Toppings Toppings Petition 1.docx	AC and AWP; Common Interest	Notes regarding status, strategy, and/or mental impressions by/for counsel regarding other (minor child related) litigation	X	The metadata does not provide an attorney, though like many of the other similar documents logged, this document is clearly (watermarked) a draft petition for filing by the prosecutor's office.

Privilege ID Number	Bates No. (Redacted Document)	Document Date	Custodian	Document Type	Author	Recipient	cc.	Subject/ Document Title	Privilege Asserted	Factual Basis of Privilege	Document Relates to Damages	Enhanced Description
PRVCTRL000039		9/20/2017 0:00	Thompson, Beth	pdf	Peter Mougey^	Beth Thompson	Greene, Ketchum, Farrell, Bailey & Tweet, LLP^, Baron & Budd, P.C.^, Hill, Peterson, Carper Bee & Deitzler, PLLC^, McHugh Fuller Law Group, PLLC^	Confidential Attorney Privileged	AC and AWP;Common Interest	Attachment to email between outside counsel and client regarding legal hold letter.	X	Description erroneously identifies the entry as an attachment only, but the metadata clearly describes a privileged email.
PRVCTRL0000095		7/31/2017 0:00	Shoemaker, Greg	msg	Katie Mayo^	Roscoe Adkins, Deborah Berry, James Boggs, Jill Callihan, Lora Chafin^, Paul Farrell^, Jennifer Herrad, Page Poerschke^, Beth Thompson, Pam White	Jeff Gaddy^	Opioid Project Call Dates/Times	AC and AWP;Common Interest	Attachment to email regarding request for and legal advice from outside counsel regarding current litigation.	X	Description erroneously identifies the entry as an attachment only, but the metadata clearly describes a privileged email.
PRVCTRL0000161		1/31/2017 0:00	Shoemaker, Greg	eml	Turley, Jessica	Lindsay Roberts^		FW: New ER petition filed	Not Privileged	Attachment to email discussing draft pleading.		Description erroneously identifies the entry as an attachment only, but the metadata clearly describes a privileged email.
PRVCTRL0000284		9/28/2015 0:00	Network Data / Cabell County Commission Office	docx	Toya D. Moore			Information for petition.docx	Attorney Client Communication; Attorney Work Product	Attachment to email between client and counsel seeking/providing legal advice and mental impressions regarding draft pleading		The document is a loose document that is part of a family that does not include an email. There is no email associated with this document. Moreover, the document is privileged as identified on the tab titled "Appendix B"
PRVCTRL0000305		9/14/2015 0:00	Network Data / Cabell County Commission Office	doc	Brandon Williams			Ward Petition.doc	AC and AWP	Attachment to email between client and counsel seeking/providing legal advice and mental impressions regarding draft pleading		The document is a loose document that is part of a family that does not include an email. There is no email associated with this document. Moreover, the document is privileged as identified on the tab titled "Appendix B"
PRVCTRL0000327		8/28/2015 0:00	Network Data / Cabell County Commission Office	docx	Lorren Apgar			Holland Petition.docx	AC and AWP;Common Interest	Attachment to email between client and counsel seeking/providing legal advice and mental impressions regarding draft pleading		The document is a loose document that is part of a family that does not include an email. There is no email associated with this document. Moreover, the document is privileged as identified on the tab titled "Appendix B"
PRVCTRL0000339		10/14/2015 0:00	Network Data / Cabell County Commission Office	docx	Morgan Brumfield			Watson, Amanda - Intake Info..docx	Attorney Client Communication;Attorney Work Product	Attachment to email between client and counsel seeking/providing legal advice and mental impressions regarding draft pleading	X	The document is a loose document that is part of a family that does not include an email. There is no email associated with this document. Moreover, the document is privileged as identified on the tab titled "Appendix B"
PRVCTRL0000411		2/17/2016 0:00	Network Data / Cabell County Commission Office	docx	Harper A. Thacker			Friend Petition.docx	Attorney Client Communication;Attorney Work Product;Common Interest	Attachment to email between client and counsel seeking/providing legal advice and mental impressions regarding draft pleading	X	The document is a loose document that is part of a family that does not include an email. There is no email associated with this document. Moreover, the document is privileged as identified on the tab titled "Appendix B"
PRVCTRL0000426		3/15/2016 0:00	Network Data / Cabell County Commission Office	docx	WVOT			Hamrick petition.docx	AC and AWP;Common Interest	Attachment to email between client and counsel seeking/providing legal advice and mental impressions regarding draft pleading	X	The document is a loose document that is part of a family that does not include an email. There is no email associated with this document. Moreover, the document is privileged as identified on the tab titled "Appendix B"
PRVCTRL0000429		3/29/2016 0:00	Network Data / Cabell County Commission Office	docx	Kevin Wilson			Shayanna Harper Petition Draft.docx	Attorney Work Product	Attachment to email between client and counsel seeking/providing legal advice and mental impressions regarding draft pleading		Privilege description is incorrect. The document is a case summary authored by Lindsay Casto (paralegal). The metadata field states "email", but there is no email to this document.
PRVCTRL0000457		4/7/2016 0:00	Network Data / Cabell County Commission Office	doc	Demetria Kosh			WattsPetition.doc	AC and AWP; Common Interest	Attachment to email between client and counsel seeking/providing legal advice and mental impressions regarding draft pleading	X	The document is a loose document that is part of a family that does not include an email. There is no email associated with this document. Moreover, the document is privileged as identified on the tab titled "Appendix B"